

**STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION**

Informational Docket Opened Pursuant to
Order No. 2021-570 issued in Docket No.
2020-125-E

Docket No. 2022-22-E

PETITION TO INTERVENE OF AARP

AARP¹, by and through counsel, pursuant to R. 103-825 of the Commission's rules, respectfully petitions the South Carolina Public Service Commission ("Commission") for formal intervention as a party in the above-captioned matter. In support of this petition, AARP states as follows:

1. AARP, with its nearly 38 million members in all 50 States and the District of Columbia, Puerto Rico, and U.S. Virgin Islands, is a nonpartisan, nonprofit, nationwide organization that helps people turn their goals and dreams into real possibilities, strengthens communities and fights for the issues that matter most to families such as healthcare, employment and income security, retirement planning, affordable utilities and protection from financial abuse. AARP has more than 600,000 members in South Carolina, many of whom are residential electric customers of Dominion Energy South Carolina ("DESC" or "Company").
2. AARP's interest in this matter and its grounds for intervention relate to its intervention in the Application of Dominion Energy South Carolina, Inc. for Adjustment of Rates (Docket No. 2020-125-E). On July 2, 2021, the parties to that docket moved for entry of an order

¹In 1999, the "American Association of Retired Persons" changed its name to simply "AARP", in recognition of the fact that people do not have to be retired to become members.

approving a comprehensive settlement agreement resolving all issues raised in that docket.²

The Commission approved the parties' settlement agreement by order dated July 21, 2021.

3. Paragraph 21 of the settlement agreement provides that

DESC commits to initiate a stakeholder process within 90 days after the Commission issues a final order approving the terms of this Settlement Agreement. The Parties to [Docket 2020-125-E] will be invited to become a member of the stakeholder group. The purpose of this stakeholder process is to examine an electricity affordability program for DESC's low-income customers and address the need for legislation to implement such a program. The electricity affordability program may provide for: (1) an affordable payment program that provides a discount to eligible customers on their monthly bills, or caps their monthly bills based on income; (2) an arrearage crediting or arrearage management program. DESC will open a docket at the Commission and all information from stakeholder meetings will be filed in such docket. In this process, DESC will expressly evaluate a Percentage of Income Payment Program and Arrearage Crediting Program modeled after those offered by Dominion East Ohio.

4. On December 14, 2021, DESC and other parties, including AARP, conducted an initial stakeholder meeting during which they discussed options for an electricity affordability program and a timeline for submission of comments and feedback concerning the proposals discussed.
5. On January 10, 2022, DESC opened the above-captioned docket.
6. AARP later requested, and DESC agreed to, an extension until January 24, 2022 for the submission of comments and feedback to DESC. On January 20, 2022, AARP submitted its comments concerning the initial stakeholder meeting to DESC, which are attached hereto as **Exhibit A**.

² CMC Steel South Carolina did not oppose the comprehensive settlement agreement but also did not join in the parties' motion for its approval.

7. To ensure that AARP can submit relevant information to the Commission concerning the stakeholder process and that it also receives timely notification of filings, AARP seeks to intervene in the above-referenced docket. Intervention will facilitate AARP's advocacy on behalf of residential electric customers, including those over age 50, who devote a higher percentage of their total spending than do other age groups toward residential energy costs. Many older consumers also have special needs and safety concerns about their access to electric service. As a result, these customers have a substantial interest in the outcome of the stakeholder process.
8. AARP's specific interest in this proceeding will not be adequately represented by other parties. AARP believes that its intervention and participation in this proceeding would serve the public interest and wishes to become a party to this case for all purposes. Moreover, AARP can assure that its intervention would not unduly delay the proceedings nor prejudice the rights of any other party.
9. AARP is represented by the following counsel in this proceeding:

Adam Protheroe
South Carolina Appleseed Legal Justice Center
PO Box 7187
Columbia, SC 29202
(803) 779-1113

WHEREFORE, AARP respectfully requests that the Commission grant its Petition to Intervene, entitling it to fully participate in this proceeding.

Respectfully submitted,

s/ Adam Protheroe

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Attorney for AARP

Dated: February 3, 2022

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to official service list in Docket No. 2022-22-E at the South Carolina Public Service Commission, on February 3, 2022. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment by contempt.

Signed: February 3, 2022

s/ Adam Protheroe